

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)	DOCKET NO. 05-10520-RCL
THE PROPERTY AND CASUALTY)	
INITIATIVE, LLC,)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA)	
acting through the NATIONAL)	
CREDIT UNION)	
ADMINISTRATION,)	
Defendant)	

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE ITS OPPOSITION TO DEFENDANT'S MOTION TO DISMISS**

The Plaintiff, The Property and Casualty Initiative, LLC ("PCI"), hereby moves this Court to enter an order extending the time in which PCI must file its Opposition to the Defendant's Motion to Dismiss (the "Motion") up to and including October 20, 2005. As grounds therefor, Plaintiff's counsel received the Motion in the midst of its recent office relocation. Extending the present response deadline of October 5, 2005 by two weeks will afford Plaintiff sufficient time to fully research and brief the various issues raised in the Motion.

The Defendant has assented to the filing of this motion and entry of the relief sought herein.

WHEREFORE, the Plaintiff, The Property and Casualty Initiative, LLC, respectfully requests that this Court extend to October 20, 2005, the deadline for filing an opposition to the Defendant's motion to dismiss.

The Property and Casualty Initiative, LLC
By its attorneys,

A handwritten signature in cursive script, appearing to read "Richard E. Gentilli", written over a horizontal line.

Richard E. Gentilli

BBO # 189080

Frank F. McGinn

BBO # 564729

Bartlett Hackett Feinberg P.C.

155 Federal Street, 9th Floor

Boston, MA 02110

617/422-0200

Dated: September 28, 2005

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CERTIFICATE OF SERVICE

I, Frank F. McGinn, hereby certify that on September 28, 2005, true and correct copies of Plaintiff's Motion for Extension of Time in Which to File its Opposition to Defendant's Motion to Dismiss were served on the individuals listed on the attached Service List, electronically or by first class mail.



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The Property and Casualty Initiative, LLC v. United States of America
Case No. 05-10520-RCL

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